

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

WILLIAM TIMOTHY PERRIN, Individually
and on behalf of other similarly situated
persons,

Plaintiffs,

v.

PAPA JOHN'S INTERNATIONAL, INC.,

Defendant.

Case No. 09-01335-AGF

DEFENDANTS' QUESTIONNAIRE TO

Defendants Papa John's International, Inc. and Papa John's USA, Inc., serve this Discovery Questionnaire under Rules 33 and 34 of the Federal Rules of Civil Procedure.

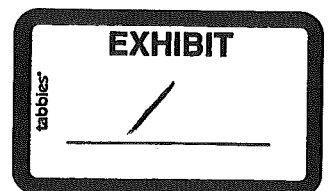
Introduction

This Questionnaire is being sent to you because you have joined the following lawsuit: *William Timothy Perrin v. Papa John's International, Inc., et al.*, Case No. 4:09CV01335 AGF, pending in the United States District Court for the Eastern District of Missouri. This Questionnaire (i) includes questions you must answer in connection with this lawsuit, and (ii) requires you to produce requested documents in your possession or control.

Instructions

1. Completely, accurately, and legibly answer all of the questions in the space provided. If you need additional space to complete your answer, be sure to use additional sheets of paper and identify on the additional sheets of paper which question you are answering.
2. If you do not know the answer to a question, state that you do not know the answer. Do not guess or estimate.
3. Attach photocopies of any document requested in this Questionnaire.
4. Your responses to this Questionnaire, including your production of documents, are due _____.
5. Before you return the completed Questionnaire, sign the Verification page at the end of this document.

Employee ID _____



Questionnaire

1. **Personal Information.** Provide the following information about yourself.

First Name, Middle Initial, Last Name	
Address	

2. **Employment Information.** Provide the following information about your employment as a pizza delivery drive with Papa John's.

Store Address & Number	Beginning Employment Date	Ending Employment Date

Note: Attach copies of documents you maintained that show compensation paid to you by Papa John's, including delivery reimbursement, during your employment as a delivery driver with Papa John's.

Employee ID _____

3. **General Automobile Information.** State the number of automobiles you used to deliver pizzas while employed by Papa John's from August 18, 2006 to the present:

_____.

For each automobile you used to deliver pizzas for Papa John's from August 18, 2006 to the present, provide the following information that you know without guessing or estimating. If you used more than one automobile to deliver pizzas while employed by Papa John's from August 18, 2006 to the present, copy the table below and complete a separate table for each automobile.

Year/Make/Model	
Name of Owner(s)	
Date of Purchase or Date You Otherwise First Possessed the Automobile	
Name of Person(s) Who Paid for Automobile	
Purchase Price	
Value When You First Began Using It for Pizza Delivery	
Value When You Last Used It for Pizza Delivery	
Did you track your miles per gallon while delivering pizza?	Yes _____ No _____
If you tracked your miles per gallon, state your average Miles Per Gallon During Time Used for Pizza Delivery	
Approximate Date First Used for Pizza Delivery	
Approximate Date Last Used for Pizza Delivery	
Odometer Reading When First Used for Pizza Delivery	
Odometer Reading When Last Used for Pizza Delivery	
Average Number of Miles Driven for Any Reason Per Week	

Employee ID _____

Average Number of Miles Driven for Pizza Delivery Per Week	
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Note: Attach copies of any documents in your possession showing information about each automobile identified in your response to question 3, including the registration and value; mileage logs reflecting personal and/or delivery use; receipts regarding fuel purchases, etc.

Have you ever sought an itemized tax deduction for unreimbursed business expenses related to your vehicle during your employment as a delivery driver for Papa John's since 2006? Yes _____ No _____

If yes, please provide copies of your itemization of unreimbursed business expenses related to your vehicle in your federal and state income tax returns (e.g. IRS Form 1040, Schedule A) for the years 2006-present (except that you may limit your production to those year(s) you were employed by Papa John's).

4. **Automobile Insurance Information.** For each automobile you used to deliver pizzas for Papa John's from August 18, 2006 to the present, provide the following information about insurance for the automobile. If you used more than one automobile, copy the table below and complete a separate table for each automobile.

Year/Make/Model	
Insurer Name	
Start Date and End Date of Policy	
Name of Each Person Covered by the Policy	
Name of Person Who Paid for Policy	
Monthly Premium Paid	
Date and Description of Claims Made Against Policy	

Note: Attach proof of insurance cards or other information about each insurance policy identified in your response to question 4.

Employee ID _____

5. **Automobile Service or Repair Information.** For each automobile you used to deliver pizzas for Pizza John's from August 18, 2006 to the present identified in your response to question 3, by year/make/model, provide to the best of your ability the following information about service and repairs, including parts, supplies, labor, and fluid purchased, for the automobile. If you used more than one automobile to deliver pizzas for Papa John's from August 18, 2006 to the present, copy the table below and complete a separate table for each automobile.

Year/Make/Model: _____

Date of Service, Repair or Purchase	Specific Description of Service, Repair or Purchase	Name and Address of Service Provider	Cost and Name of Person Who Paid the Repair or Purchase Cost

Did you incur other expenses not listed above to maintain your vehicle that you do not recall specific information for? Yes _____ No _____

Note: Attach copies of receipts, cancelled checks, or other documents showing amounts paid for service, repair, parts, supplies and fluids purchased for each automobile identified in response to question 3.

Employee ID _____

6. **Bankruptcy Information.** From August 18, 2006 to the present, have you filed for bankruptcy? Yes _____ No _____

If yes, provide the information requested below:

Date Filed	Name of Court	Case Number	Status

Employee ID _____

VERIFICATION

I, _____, affirm and attest that I have carefully prepared, read, and reviewed these answers to Defendants' Questionnaire and the documents produced in response to Defendants' Questionnaire. I further affirm and attest that these answers are complete, accurate, and truthful and that these documents are all the documents I have or could find after a diligent search.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on this _____ day of _____, 2012.

(signature)

11882050.1 (OGLETREE)

Employee ID _____